January 1994

DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: GM Powertrain

ADDRESS: 11032 Tidewater Trail
Fredericksburg, VA 22408

EPA ID NUMBER: VAD091222588

FACILITY REPRESENTATIVE: Marvin Hall

TITLE: Environmental/Utility Site Manager

TELEPHONE NUMBER: 540-899-5065

INSPECTOR'S NAME: Stacey M. Rosenquist

TITLE: Enforcement/Compliance Specialist Sr.

DATE of INSPECTION: April 12, 1999

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

   Manufactures automatic transmission components, converter clutch (torque converter clutch)

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

   D039- spent parts washer solvent

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
D039	15 gallons	N/A

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)?

NO

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste?

NO

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent?
(List all transporters and facilities, or on-site treatment performed).

Transporter: Safety Kleen ILD984908202
TSD Facility: Safety Kleen VAD981043011

6. Does the facility generate any hazardous waste that is excluded from regulation?

NO

If **yes**, list the waste and the basis for exclusion.

7. Does the facility:

Generate **Market** **Burn**

used oil that is burned for energy recovery? **Underline or circle all that are applicable.**(If the facility **markets** or burns used oil, fill out the **Used Oil Checklist**.)

YES

Safety Kleen picks up the used oil.

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste?

NO

If **YES**, then fill out the **Used Oil Checklist.**

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If **Yes**, list the waste, where it is sent, and complete the **Metals Recovery Checklist**.

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries?

NO

If **yes**, Underline or **circle** all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist**.

10. Based on the above, the facility is a:

a. **conditionally exempt small quantity generator**
b. small quantity generator
c. generator
d. interim status TSD
e. unpermitted TSD (explain in comments section)
f. transporter
g. other:_____

[Underline or **Circle** All That Are Applicable]

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	# of Containers	# of Tanks	Capacity
Press Area	1 (parts washer unit)	0	30 gallons

13. Comments:

See Checklist.

14. Waste Management Flow Diagram:

(On this page sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

N/A

January 1994

DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF CONDITIONALLY EXEMPT SMALL QUANTITY GENERATORS (CESQG)

FACILITY NAME: GM Powertrain

EPA ID NUMBER: VAD091222588

INSPECTION DATE: April 12, 1999

NOTE: * means Non-Compliance

VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES	NO	N/A
3.2.G.	In order for HW from a CESQG to be excluded from full regulation, the generator shall comply with Section 6.1., HW determination. **NOTE: If CESQG accumulation at any time exceeds 1,000 kilograms, then it is a SQG!**	X		
3.2.F.3. 3.2.G.3.	The CESQG may treat or dispose of his waste in an on-site facility, or ensure delivery to an off-site facility, either of which is:			
	1. A permitted facility; or	X		
	2. An interim status facility; or		X	
	3. A permitted, licensed, or registered municipal or industrial solid waste facility that is authorized to accept HW; or		X	
	(If 3. above, does the facility have written permission from the Department?)		X	
	4. A facility which beneficially uses or reuses, or legitimately recycles or reclaims the waste; or		X	
	5. A facility which treats the waste prior to beneficial use or reuse, or legitimate recycling or reclamation.		X	

COMMENTS:

GM Powertrain has one parts washer unit that is serviced by Safety Kleen.

Virginia Department Of Environmental Quality
Division of Technical Services
Office of Waste Permitting

629 E. Main St., P.O. Box 10009, Richmond, VA 23240-0009

Subject: EPA ID No VAD091222588 - GM Powertrain Group, General Motors Corporation, Fredericksburg, Virginia - Spotsylvania County - Site Assessment & Site Inspection Report, dated August 11, 1998 - Revisions to SWMUs No 1 and No 2, pages 8 and 9

To: Mike Jacobi, EPA Region III (3WC23)

From: Richard J. Criqui, Jr., C.P.S.S., Environmental Engineer Senior

Date: April 13, 1999

Copies: Lisa Ellis, DEQ, (w/attachments)
Stacey Rosenquest, NRO, DEQ (w/attachments)
Marvin Hall, GM Powertrain, Fredericksburg, VA (w/attachments)

The purpose of this memorandum is to provide the EPA with the documentation of the revisions to the Site Assessment and Site Inspection Report of the GM Powertrain Group, General Motors Corporation, (formerly GMC Delco Moraine), Fredericksburg, Virginia, dated August 11, 1998.

The above site assessment and site inspection report were part of the work share agreement between the DEQ and the EPA for fiscal year 1998. The above report provided facility information for the EPA's Environmental Indicator Determination Program.

A follow-up site visit of the subject facility was made on April 12, 1999, with Mike Jacobi, Project Manager, General Operations Branch, EPA Region III, Stacey Rosenquist, Northern Regional Office, DEQ, and the writer. The site visit meeting and follow-up site inspection were led by Mr. Marvin Hall, Environmental and Utility Site Manager, and other representatives from the GM Powertrain Group facility and the corporate parent, General Motors.

During the inspection of the two hazardous waste management units, SWMU No 1 and SWMU No 2, the staff discovered some errors in the original report, dated August 11, 1998. The corrections to the original report and (errors) are as follows:

1. SWMU No 1 - Former HWMU - The SWMU was used from 1981 to 1991. (The original text indicated that this SWMU was used until 1981.)

2. SWMU No 2 - Former HWMU - The SWMU was used until 1981. The storage area size was 20 x 60 ft. (The original text indicated that this SWMU was used from 1981 to 1991 and the size of the unit was described as 30 x 60 ft.)

The documentation of the revisions to the original text are being provided by this memorandum along with the two revised replacement pages 8 and 9 for the above original report (attached).

Please replace pages 8 and 9 of the original report with the attached revised pages.

If you have any questions regarding the above, please do not hesitate to contact me at (804) 698-4013.

3. The referenced storage of 1,1,1-trichloroethane (F001) occurred in July, 1988, near the paint storage locker area, an area isolated from the other plant operations. Approximately five drums were stored as generated from the laboratory. It was an isolated incident, and no spills or releases of solvents occurred. It is believed that the storage area is not contaminated, and; therefore, does not require closure. The laboratory now operates a still which recycles the spent solvent within 1 to 2 days after being generated (1990). (The still no longer exists; see SWMU No 48 below.)

4. Tanks were not used for storage of hazardous waste at this site.

Subsequent correspondence from Clifford J. Smith, Plant Manager, Delco Moraine, Fredericksburg, dated May 23, 1990, confirmed the above information. (See attached letter.)

It should be noted that during the time between the inception of the first closure plan submittal (1989) and the closure report submittal (1995), ajax sludge was reclassified as non-hazardous by the EPA and the DEQ. Ajax sludge was subsequently redesignated by the EPA and the DEQ as a solid waste and removed from the classification as a D001 hazardous waste after the EPA and the DEQ reviewed the sludge test results from the U. S. Department of Transportation test methods for oxidizers and the Toxicity Characteristic Leaching Procedure (TCLP). (A chemical and physical analysis sheet of the ajax sludge from the RCRA Part B permit application is attached.)

SITE INSPECTION

During the site inspection, Mr. Hall and the writer identified solid waste management units (SWMUs), hazardous waste management units (HWMUs), and areas of concern (AOCs) that either previously existed or which currently exist based upon available knowledge and documentation about the facility. The identified SWMUs, HWMUs, and AOCs are shown on the attached Figures 3 & 4, Site Plans with SWMUs.

A listing of SWMUs, HWMUs, and the AOCs identified at the facility are provided below along with additional summary information:

1. SWMU No 1 - Former HWMU - Ajax Sludge Container Storage Area No 1 - This SWMU was used from 1981 to 1991. Ajax sludge was stored in a concrete-paved hazardous waste container storage area (30 x 80 ft) located outside and northwest of the main manufacturing plant building. The ajax sludge was stored in 55 gallon drums, four drums on a pallet, and

stacked two pallets high. The site was certified closed by correspondence from GM Powertrain, dated November 3, 1995. The DEQ approved the clean closure certification by correspondence dated February 27, 1996. Ajax sludge was determined to be non-hazardous by the EPA and the DEQ in the midst of the closure activities for this SWMU.

2. SWMU No 2 - Former HWMU - Ajax Sludge Container Storage Area No 2 - This SWMU was used until 1981. Ajax sludge was stored in a concrete-paved hazardous waste container storage area (20 x 60 ft) located outside and northwest of the main manufacturing plant building. The ajax sludge was stored in 55 gallon drums, four drums on a pallet, and stacked two pallets high. The site was certified closed by correspondence dated November 3, 1995. The DEQ approved the clean closure certification by correspondence dated February 27, 1996. Ajax sludge was determined to be non-hazardous by the EPA and the DEQ in the midst of the closure activities for this SWMU.

3. SWMU No 3 - Ajax Sludge Waste Pour Station No 1 - Ajax sludge is generated from two metal hardening heat treatment units which are used at the facility. The molten ajax salt is poured from the metal heat treatment dip tanks into metal hoppers when the ajax molten salt needs to be wasted based upon chemical specifications. The red hot molten ajax salt at this station has a temperature of 1600 °F. The liquid salt or sludge is moved to SWMU No 5 for cooling prior to transfer to SWMU No 6.

4. SWMU No 4 - Ajax Sludge Waste Pour Station No 2 - Ajax sludge is generated from two metal hardening heat treatment units which are used at the facility. The molten ajax salt is poured from the metal heat treatment dip tanks into metal hoppers when the ajax molten salt needs to be wasted based upon chemical specifications. The red hot molten ajax salt at this station has a temperature of 1600 °F. The liquid salt or sludge is moved to SWMU No 5 for cooling prior to transfer to SWMU No 6.

5. SWMU No 5 - Ajax Sludge Hopper Staging Area - Ajax sludge is transferred from SWMUs No 3 and 4 and is temporarily stored in the ajax sludge hopper staging area until the hot sludge is cool enough for transfer to a large 30 cubic yard roll off container (SWMU No 6) located outside the facility.

6. SWMU No 6 - 30 cubic yard Roll-Off Container for Ajax Sludge - The large roll-off container is used to store ajax sludge on-site until it is sent off-site for disposal. The facility generated 151 tons/yr of ajax sludge in 1997. (The sludge is a dried hardened salt when shipped from the site.) The sludge is non-hazardous. (See background discussion.)

C-136-99

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Dennis H. Treacy
Director

Gregory L. Clayton
Regional Director

April 15, 1999

Mr. Marvin Hall
GM Powertrain
11032 Tidewater Trail
Fredericksburg, VA 22408

Re: RCRA Inspection
GM Powertrain - VAD091222588

Dear Mr. Hall:

Thank you for your cooperation during the compliance evaluation inspection conducted at your facility on April 12, 1999, by the Virginia Department of Environmental Quality (DEQ), Northern Virginia Regional Office (NVRO). During this inspection, NVRO evaluated the facility for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) as a Conditionally Exempt Small Quantity Generator. I have enclosed a completed summary sheet and inspection checklist for your review.

Based on review of observations, responses, and documents obtained during this inspection, it appears that the facility is in compliance with the VHWMR.

If you have any questions, please call me at (703) 583-3891.

Sincerely,

Stacey M. Rosenquist

Stacey M. Rosenquist
Enforcement/Compliance Specialist Sr.

Enclosures

cc: Claire Ballard
Jon Terry